

MDL 1570 PLAINTIFFS' EXECUTIVE COMMITTEES

In re: Terrorist Attacks on September 11, 2001 (S.D.N.Y.)

Plaintiffs' Executive Committee for Personal Injury and Death Claims	Plaintiffs' Executive Committee for Commercial Claims
Ronald L. Motley, (1944-2013) Jodi Westbrook Flowers / Donald A. Migliori, <i>Co-Chairs</i> MOTLEY RICE LLC James P. Kreindler, <i>Co-Chair</i> KREINDLER & KREINDLER LLP	Stephen A. Cozen, <i>Co-Chair</i> Sean Carter, <i>Co-Chair</i> COZEN O'CONNOR
Andrew J. Maloney III, <i>Co-Liaison Counsel</i> KREINDLER & KREINDLER LLP Robert T. Haefele, <i>Co-Liaison Counsel</i> MOTLEY RICE LLC	J. Scott Tarbutton, <i>Liaison Counsel</i> COZEN O'CONNOR

BY ECF

April 23, 2020

The Honorable Sarah Netburn
 United States Magistrate Judge
 Thurgood Marshall Courthouse
 40 Foley Square, Room 430
 New York, NY 10007

Re: *In Re: Terrorist Attacks on September 11, 2001, 03 MDL 1570 (GBD) (SN)*

Dear Judge Netburn:

Further to the Court's request at the April 17, 2020 phone hearing, Plaintiffs have contacted counsel for Saudi Arabia and Dallah Avco, and can confirm that the parties are available on Thursday, May 14, and also on Thursday, May 21, for the proposed phone/video hearing(s) on Saudi Arabia's motion for a protective order, Plaintiffs' cross-motion to compel, and the deposition protocol. We provided two dates in the event that a "two-phase" hearing is scheduled, as suggested by the Court at the April 17 hearing.

In our email exchanges, the Kingdom requested that we include the following questions for the Court: "(1) what issues will be on the agenda for each date, and (2) whether the hearing or hearings will be open to the public for purposes of discussion of information subject to the FBI or MDL protective orders."

Plaintiffs await your Honor's instructions regarding the format and subject matter, and will be prepared at the hearing(s) to address all of the issues in the pending motions and protocol submissions. While the PECs have not yet considered the documents and information we expect to use at the hearing(s), we anticipate the hearing will be open, so that the 9/11 Families and the public may attend. If and when any of the parties determine that protected material will be addressed, they should present a proposal on how to handle that material.

Respectfully submitted,

KREINDLER & KREINDLER

/s/ Steven R. Pounian

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MDL 1570 Plaintiffs' Exec. Committee
for Personal Injury and Death Claims

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for Commercial Claims

MOTLEY RICE

/s/ Robert T. Haefele

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cc: All counsel of record via ECF